

Non-Directive BHHRA Comment Issues

Issues needing discussion with EPA

1. Change to Exposure Scenarios
2. Change in Dataset
3. Clarifications Needed

Issues needing discussion with EPA only if EPA does not agree with our written response

4. Summary of Risk Results
5. Carcinogenic PAHs
6. Additional Language, Information, and/or Analyses Will Be Provided
7. Probabilistic Risk Assessment
8. Changes to Text
 - a. Use of the Term "Conservative"
 - b. Modification to Suggested Language
 - c. Description of RME Exposure Point Concentration

Issues that do not need further discussion with EPA

9. Risk Management Recommendations
10. Use of COCs in the FS and Beyond
11. ARAR Evaluation in the BHHRA
12. Risk Driver Section in the BHHRA
13. Changes to Text
 - a. Deletion of Factual Statements and Comments on Remedy
 - b. Deletion of EPA Direction
 - c. Characterization of Ingestion Rates
 - d. Deletion of Language Regarding Compounding of Conservative Assumptions
14. Clam Consumption Scenario
15. Regional Tissue Concentrations

Non-Directive BERA Comment Issues

Issues needing discussion with EPA

1. Calculation of additive risks to fish for dietary LOE
2. Assess risk at the individual sample scale vs. 95% UCL over larger spatial extent
3. Fish tissue TRVs for Antimony, Cd, PCBs, DDX, Hg, Lindane,
4. Inclusion of carp data in fish tissue residue analysis
5. Use of TTC/TSC methods for dietary approach
6. Bird dioxin TRV
7. Inclusion of recently available osprey egg data
8. Clarifications needed

Issues needing discussion with EPA only if EPA does not agree with our written response

9. Use of background/upstream data in BERA
10. Further evaluation of lesion prevalence in fish
11. SLERA/Refined screen process
12. Dietary uncertainty analysis
13. Downstream data
14. Use of BSAFs/ BSARs in shore-bird risk calculations.
15. Fish dietary PCB and DDT TRVs
16. Include HQs in summary tables
17. Remove table 7-40 "effects considerations" for TBT and PCBs

Issues that do not need further discussion with EPA

18. Use of COCs in the FS and beyond
19. Risk Management Recommendations
20. Eco HQs ≥ 1
21. Treatment of TZW
22. Uncertainties that contribute to underestimating risk
23. Use factual statements
24. Address uncertainty in RI dataset
25. Use of XAD vs. peristaltic data
26. Population vs. organismal evaluation
27. Calculation of AWQC PCB and DDT direct exposure TRVs
28. Weight of evidence analysis